

1 Eugene S. Alkana (SBN 60411)
E-mail: eugenealkana@yahoo.com
2 131 N El Molino Avenue
Pasadena, CA 91101-1873
3 Telephone: (626) 808-6792
Facsimile: (626) 795-6138
4

Attorney for Defendants
5 Visiting Angels Home Health Services, Inc. and
Naira Tshorokhyan
6

7
8
9 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

10 LIVING ASSISTANCE SERVICES,
11 INC. d/b/a VISITING ANGELS

12 Plaintiff,

13 v.

14 VISITING ANGELS HOME HEALTH
15 SERVICES, INC., et al.

16 Defendants.

Case No.: 2:12-cv-09002-DSF-JC

DECLARATION OF EUGENE S.
ALKANA IN SUPPORT OF THE
AMENDED STIPULATION TO
MODIFY THE COURT'S
SCHEDULING AND CASE
MANAGEMENT ORDER

17 I, Eugene S. Alkana, declare as follows:

18 1. I am an attorney at Law Offices of Eugene S. Alkana, attorney for
19 defendants Visiting Angels Home Health Services, Inc. and Naira Tshorokhyan
20 (collectively "Defendants") in the above-captioned action.

21 2. I submit this declaration pursuant to Judge Fischer's individual practices
22 in support of the parties' Amended Stipulation to Modify the Court's Scheduling and
23 Case Management Order.

24 3. Defendant, Naira Tshorokhyan, has been unable to participate in this
25 litigation due to an ongoing health condition and recent surgery.
26
27
28

1 4. The parties were scheduled to participate in a mediation on August 19,
2 2013. On August 13, 2013, I sent a letter to the mediator, Jeff Kichaven, cancelling
3 the mediation scheduled on August, 19, 2013. In the letter, I advised Mr. Kichaven
4 that Defendant, Naira Tshorokhyan, had been unexpectedly hospitalized and had
5 undergone surgery and consequently could not participate in mediation because she
6 was still under medical care.

7 5. On August 29, 2013, my legal assistant, Kathleen Wilber, advised
8 Plaintiff's counsel that Defendant, Naira Tshorokhyan, was ill and unable to timely
9 respond to Plaintiff's first set of discovery requests.

10 I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is
11 true and correct.

12 Executed this 24th day of October, 2013 at PASADENA, California.

13
14 By: 

15 Eugene S. Alkana (SBN 60411)
16 E-mail: eugenealkana@yahoo.com
17 131 N El Molino Avenue
18 Pasadena, CA 91101-1873
19 Telephone: (626) 808-6792
20 Facsimile: (626) 795-6138

21 Attorney for Defendants
22 Visiting Angels Home Health Services, Inc. and
23 Naira Tshorokhyan
24
25
26
27
28

DM2\4518567.1